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Statement of the Connecticut Association of Optometrists  
January 27, 2021  
Senate Bill 261  
Submitted by: Erin McCleary, OD

Good Afternoon Senator Cassano, Representative Lemar, Senator Somers, Representative Carney, and members of the Transportation Committee. I would like to thank the entire Transportation Committee for the opportunity to speak with you today regarding Senate Bill 261 with regards to modifications to the current DMV statutes. My name is Dr. Erin McCleary, a board-certified optometrist who is licensed, and has been practicing advanced optometric care, in Connecticut for the last 14 years. I am the Immediate Past-President of the Connecticut Association of Optometrists and currently own and practice at Clear Horizon Eyecare in Plainville, CT.

First of all, I would like to applaud the committee for continuing to support, and even including NEW additional language with regards to vision screening as a requirement for licensure [**see Sec 10, 14-36b (new) and 14-36c (modified)**]. As an eye care provider, I certainly feel that a vision assessment should be required for all drivers within the state of Connecticut. Of note, the new language appears to remove the vision screening component from the offered DMV services and instead requires the applicant to obtain said vision screening verification from a medical professional. As defined in **section 14-46c**, these are appropriate medical providers, inclusive of ophthalmology and optometry alike.

In requiring the vision assessment to be completed by a medical professional, in lieu of the DMV, this move will have an impact on both drivers and physicians alike. First of all, license applicants will now carry the burden of obtaining the appropriate vision screening at a physician's office at a cost, possibly not covered by their insurance. Secondly, if a license applicant requests "only" a vision screening for DMV purposes, there becomes a question of medical / professional liability on the medical professional's behalf. For example, what would happen if a person comes in for a simple screening (moreover, a screening is NOT equivalent to a comprehensive eye exam) and an ocular condition is not discovered because the evaluation was limited to the vision and visual field requirements? The DMV would have no accountability by performing a vision screening on their premises, but an ophthalmologist or optometrist may be at risk if only visual acuity and gross visual fields were obtained.

Further, in the process of modifying the language of the statute from "vision screening" to medical professionals certifying that the applicant meets the **"vision standards established in regulations adopted under section 14-45a,"** this is in fact actually more inclusive of evaluating the patient for **"(3) No evidence of any other visual condition(s) which either alone or in combination will significantly impair driving ability."** In essence, it would appear to mandate comprehensive eye exams in place of a simple screening. While any eye care provider would never argue that comprehensive eye exams are a bad thing (quite the contrary), I am not sure if this is the intent of the language amendment, and may require clarification.

I can speak to the impact of this change directly, as this very scenario happened in my office last week. I had the family of an 18 year old male call our office urgently seeking a same-day eye exam as he was scheduled for his driver's permit exam in 2-days' time, and needed to have the requisite form filled out prior to his arrival at the DMV. Calls like this will likely flood physician's offices, during a mid-COVID season where doctors are already playing catch-up with appointments.

In closing, I feel strongly that a vision assessment is truly needed prior to granting a driver's license. However, the removal of vision screenings from the DMV services does have a direct impact on both the license applicants and medical professionals now needing to fill the gap. Perhaps I may suggest a solution. Rather than removing free vision screenings from the DMV offerings, I would suggest allowing EITHER a free DMV screening OR a visual assessment certification by the previously-defined medical professionals. This gives back the benefit of choice to the constituent and providers could perform full eye exams without concern for liability. For those applicants concerned about COVID, and who don't want to have potential increased exposure risk at the DMV, they can then choose to see their own personal health professional. In addition, this would help spread the number of vision screenings between the DMV and already-busy doctor offices. Ultimately this is about the safety of our Connecticut residents, and this option ensures that license applicants have access to the rightfully-required vision screening, but on their terms.

Thank you for your time and consideration.